

COUNTY OF SUFFOLK



STEVEN BELLONE
SUFFOLK COUNTY EXECUTIVE

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DEPARTMENT OF LAW

December 24, 2020

Hon. Steven M. Gold, U.S.M.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Raheem Sessoms v. County of Suffolk et al
20-cv-00509 (AAR)(SMG)

Dear Judge Gold,

As the Court is aware, I am the Assistant County Attorney assigned to represent the Suffolk County defendants in the above-referenced case. On December 2, 2020 following the last status conference with the Court, the Court issued an Order directing, *inter alia*, that if the parties were unable to agree on the terms of a protective order, "they shall submit letter motions on the matter by January 8, 2021." I write at this time to seek clarification of said Order on behalf of both myself and Plaintiff's Counsel, Amy Marion.

Ms. Marion and I have conferred multiple times via telephone in an attempt to resolve the issue of the protective order without court intervention. Despite our best efforts to do so and the amicable manner in which we have been working together, we agree that the submission of letter motions is necessary. Our understanding of the Court's Order is that the deadline for Ms. Marion to file her motion to compel is therefore January 8, 2021 with my response being due within four days (by January 12, 2021) in compliance with the Court's Individual Practices. We therefore write at this time to simply clarify if that briefing schedule was, in fact, the Court's intention in directing that the parties file letter motions by January 8, 2021.

We thank the Court for its attention to this matter and wish you a happy and safe holiday season.

Respectfully submitted,
Dennis M. Cohen
Suffolk County Attorney
/s/ Stacy A. Skorupa
By: Stacy A. Skorupa
Assistant County Attorney

CC: Amy Marion, Esq.
(VIA ECF)

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